

**UNITED STATES U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA

v.

ROUZBEH “ROSS” HAGHIGHAT,
BEHROUZ “BRUCE” HAGHIGHAT,
KIRSTYN M. PEARL, SEYEDFARBOD
“FABIO” SABZEVARI, and JAMES D.
ROBERGE

Hon. Michael E. Farbiarz

Crim. No. 25-339

**[PROPOSED] ORDER GRANTING
DEFENDANT ROUZBEH “ROSS”
HAGHIGHAT’S OMNIBUS PRETRIAL
MOTIONS**

THIS MATTER having come before the Court upon the pretrial motions of Defendant Rouzbeh “Ross” Haghighat, by Paul Hastings LLP (Adam Fee, Esq. appearing), and the Court having considered the submissions of the parties and the arguments of counsel, and for good cause shown:

IT IS on this _____ day of _____ 2025,

ORDERED that Defendant Haghighat’s Pretrial Motions shall be and hereby are **GRANTED**, in that it is hereby

ORDERED that a bill of particulars shall be and is hereby **GRANTED**; and it is further

ORDERED the government must identify what alleged material non-public information Defendant Haghighat purportedly exchanged; and it is further

ORDERED that the government must identify when the alleged material non-public information was purportedly provided by Defendant Haghighat to Co-defendants Behrouz “Bruce” Haghighat, Kirstyn M. Pearl, Seyedfarbod “Fabio” Sabzevari, and James D. Roberge; and it is further

ORDERED that Co-defendant Sabzevari’s statements as to Defendant Haghighat are suppressed.

Honorable Michael E. Farbiarz
United States District Judge